

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

No. 3:15-MJ-739-B

KRISTOPHER LEDELL LOVE

MOTION FOR DETENTION

The United States moves for pretrial detention of the defendant, pursuant to Title 18, United States Code, Section 3142(d).

**1. Eligibility of Case:**

This case is eligible for a detention order because the case involves:

\_\_\_\_ Crime of violence (18 U.S.C §3156);

\_\_\_\_ Maximum sentence life imprisonment or death;

\_\_\_\_ 10+ year drug offense;

\_\_\_\_ Felony, with two prior convictions in any of the above categories;

X Serious risk defendant will flee;

X Serious risk obstruction of justice;

**2. Reason for Detention:**

The Court should detain the defendant because there are no conditions of release which will reasonably assure:

X Defendant's appearance is required;

X   Safety of any other person and the community;

**3. Rebuttable Presumption:**

The United States will invoke the rebuttable presumption against defendant because:

\_\_\_\_\_ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, Title 18, U.S.C. §924(c);

\_\_\_\_\_ Probable cause to believe defendant committed a crime of violence as defined in 18 U.S.C. § 3156;

**4. Time for Detention Hearing:**

The United States requests the Court conduct the detention hearing;

  X   at initial appearance;

\_\_\_\_\_ after continuance of 3 days (not more than 3).

DATED this the 6th day of October, 2015.

Respectfully submitted,

JOHN R. PARKER  
United States Attorney

/s/ Rick Calvert

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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2015, a true and correct copy of the foregoing Motion has been served on the defendant, or his counsel of record, in accordance with the provisions of Fed. R. Cr. P. 49.

/s/ Rick Calvert

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RICK CALVERT  
Assistant United States Attorney